

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, & ASHOKA

Declaration of Douglas Handshoe:

Under penalty of perjury I, Douglas Handshoe, swear and affirm the following:

- A. I am the Plaintiff / Counter defendant in this matter.
- B. I have attached the following as Exhibits to this Declaration:
 - a. Exhibit 1 - ECF No 203-12 US Copyright Office's Copyright Catalogue.
 - b. Exhibit 2 - Screen Capture of Photo used in YouTube video.
 - c. Exhibit 3 - About: Terms & Conditions of the Toronto Star website captured on May 3, 2013 by Archive.org
 - d. Exhibit 4 - ECF 34-1 News Story dated February 2, 2012 submitted by Torstar.
 - e. Exhibit 5 - ECF 186-1 Email to Brennan submitted by Mr. Leary.
 - f. Exhibit 6 – ECF 64-4 Declaration of Kathy English submitted by Torstar.
 - g. Exhibit 7 - ECF 203-17 Screen Capture of Photo used in YouTube video submitted by Mr. Leary.
 - h. Exhibit 8 - New World Creole, Open to the World Magazine, Winter 2006 Edition.
 - i. Exhibit 9 - DMCA Takedown Notice by Progress Media Group dated December 13, 2012.

- j. Exhibit 10 - ECF 175-2, Canadian Copyright Registration Number 1106087.
- k. Exhibit 11 - Email to Douglas Handshoe by YouTube dated February 15, 2014.
- l. Exhibit 12 - ECF 175-3 submitted by Mr. Leary for an example the fill in YouTube form used by Mr. Leary to submit the Takedown notice.
- m. Exhibit 13 - ECF 96-11 pages 10 and 11 submitted by Mr. Leary. Follow-up correspondence between Trout Point and YouTube, which specifically mentions DMCA Section 512(f)
- n. Exhibit 14 - ECF 111-8 YouTube's terms of Service submitted by Plaintiff.
- o. Exhibit 15 - Email from YouTube to Handshoe dated July 14, 2014.
- p. Exhibit 16 - ECF 175-4, Email from YouTube to Trout Point submitted by Mr. Leary.
- q. Exhibit 17 - Entire email chain between YouTube and Trout Point beginning with the July 14, 2014 YouTube Notice of Counter notification.
- r. Exhibit 18 - Email to Handshoe from YouTube dated August 6, 2014.
- s. Exhibit 19 - As mailed requests for Admissions to Charles Leary dated January 4, 2018.
- t. Exhibit 20 - ECF 175-1 Leary Declaration dated October 9, 2017.

I swear and affirm I have examined the Exhibit 1 through 20 and they are true and correct in all respect.

So certified this the 26th day of March, 2018,



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